UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

BARBARA GUINDON, et al
Plaintiffs

v. C.A. No.: 03-335L

AMERICAN FOAM CORPORATION, et al
Defendants

MOTION FOR ENTRY OF APPEARANCE PRO HAC VICE

Defendants, SHELL OIL COMPANY and MOTIVA ENTERPRISES, LLC, hereby move that MARK K. OSTROWSKI be admitted pro hac vice in the above case as associate trial counsel with local associate counsel identified below, on the following grounds:

- The case involves the following complex area of the law, in which pro hac vice counsel specializes: _______________________________.
- Pro hac vice counsel's long-standing representation of the client: SHELL OIL COMPANY and MOTIVA ENTERPRISES, LLC.
- The local trial bar lacks experience in the field of:____.
- The case involves complex legal questions under the law of a foreign jurisdiction with which pro hac vice counsel is familiar, specifically:
- The case requires extensive discovery in a foreign jurisdiction convenient to pro hac vice counsel, as follows: _________________________.
- It is a criminal case, and pro hac vice counsel is defendant's counsel of choice.
- Other: Mr. Ostrowski was counsel of record for Shell Oil Company and Motiva Enterprises, LLC in the action captioned Estate of Jude B. Henault et. al. v. American Foam Corporation et. al., United States District Court, District of Connecticut, Civil Action No: 03-CV-999 (DJS), which case had been transferred to this district.

Defendants
By: [signature]
Faith A. LaSalle, Esq. (#2212)
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Defendants
By: [signature]
Donna M. Lamontagne, Esq. (#5138)
Zizik, Powers, O'Connell, Spaulding & Lamontagne, P.C.
40 Westminster Street, Suite 201
Providence, RI 02903
Dated: June __, 2004

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ATTORNEY'S CERTIFICATION FOR PRO HAC VICE ADMISSION

(1.) I certify that I am a member in good standing of the bar of the State of Connecticut and the bar of the United States District Court for the District of Connecticut, without any restriction on my ability to practice, and that I understand my obligation to notify this Court immediately of any change respecting my status in this respect.

(2.) I am currently admitted, and/or within the preceding 24 months have applied to be admitted, in the following cases in this district: I am currently applying for admission in the following cases arising out of the Station Night Club Fire which are captioned: Tammy Passa, et al, v. Jeffrey Derderian, et al (C.A. No. 03-148-L); Linda Roderiques et al. v. American Foam Corporation et al. C.A. No. 04-26L; George Guindon, et al. v. American Foam Corporation, et al. (C.A. No. 03-335L); Charles Sweet et al. v. American Foam Corporation et al., C.A. No. 04-56L; and Estate of Jude B. Henault, et al. v. American Foam Corporation, et al. (C.A. No. 03-483L.

I have also applied for admission in the case of Motiva Enterprises, LLC v. Providence & Worcester Railroad Company, C.A. No. 04-220S.

Previously, I was admitted in the case of Neal R. Haber v. Reassure America Life Insurance Company, et al., CA 02-087-T. That case was dismissed by stipulation on or about November 2003.

(3.) I have read, acknowledge, and agree to observe and to be bound by the local rules and orders of this Court, including the Rules of Professional Conduct of the Rhode Island Supreme Court, as adopted by this Court as the standard of conduct for all attorneys appearing before it.

(4.) For purposes of this case I have associated with local associate counsel identified below, and have read, acknowledge, and will observe the requirements of this Court respecting the participation of local associate counsel, as set out in Local Rule 5, recognizing that failure to do so may result in my being disqualified, either upon the Court's motion or motion of other parties in the case.

I certify that I have read and join in the foregoing motion, and acknowledge and agree to observe the requirements of Local Rule 5 in its entirety and as it related to the participation and responsibilities of local associate counsel.

[signature]

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[signature: Faith A. LaSalle]

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ORDER: This motion is hereby: ________________

____
United States District Court Judge

Date: ____________________________

Certification of Service

I hereby certify that on this 25 day of June, 2004, that a true and correct copy of Motion for Entry of Appearance Pro Hac Vice has been duly furnished via First Class Mail to the following counsel of record:

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